Commonwealth of Kentucky
Division for Air Quality

PERMIT APPLICATION SUMMARY FORM

Completed by: Joshua J. Higgins

GENERAL INFORMATION:

Name:	BP Products (North America), Inc. – Bromley Pipeline Facility
Address:	409 River Road, Bromley, KY 41017
Date application received:	January 16, 2004
SIC/Source description:	5171/Petroleum Bulk Stations and Terminals
Source ID #:	21-117-00016
Source AI #:	2446
Activity #:	APE20040002
Permit number:	F-04-034

APPLICATION TYPE/PERMIT ACTIVITY:

[ ] Initial issuance
[ ] Permit modification
__Administrative
__Minor
__ Significant
[X] Permit renewal

[ ] General permit
[X] Conditional major
[ ] Title V
[ ] Synthetic minor
[ ] Operating
[X] Construction/operating

COMPLIANCE SUMMARY:

[ ] Source is out of compliance
[X] Compliance certification signed
[ ] Compliance schedule included

APPLICABLE REQUIREMENTS LIST:

[ ] NSR
[ ] PSD
[ ] Netted out of PSD/NSR
[ ] NSPS
[X] NESHAPS
[ ] Not major modification per 401 KAR 51:001,1(116)(b)
[ ] SIP
[ ] Other

MISCELLANEOUS:

[ ] Acid rain source
[ ] Source subject to 112(r)
[X] Source applied for federally enforceable emissions cap
[X] Source provided terms for alternative operating scenarios
[X] Source subject to a MACT standard (40 CFR 63, S/P Y. Recordkeeping Only)
[ ] Source requested case-by-case 112(g) or (j) determination
[ ] Application proposes new control technology
[X] Certified by responsible official
[X] Diagrams or drawings included
[ ] Confidential business information (CBI) submitted in application
[ ] Pollution Prevention Measures
[X] Area is non-attainment (list pollutants): VOC (Ozone)

EMISSIONS SUMMARY:

Pollutant	Actual (tpy)	Potential (tpy)
PM/PM_{10}	0	0
SO_2	0	0
NOx	0	0
CO	0	0
VOC	50.33	50.33
LEAD	0	0
HAP ≥ 10 tpy (by CAS)		
Total HAPs:	3.8	3.8

SOURCE PROCESS DESCRIPTION:

The Bromley Pipeline Facility operates a barge loading and transfer terminal utilizing a Barge Loading Rack (EP 11) that delivers gasoline and distillate fuel oil no. 2 to marine vessels that operate along the Ohio River. The Barge Loading Rack has a maximum pump rate of 168,000 gallons per hour (gal/hr) for both gasoline and distillate. A vapor recovery unit (VRU) with a control efficiency of 95% will be constructed to control emissions of VOCs and HAPs from the barge loading rack during gasoline loading.

The Bromley Pipeline Facility previously operated a Truck Loading Rack (EP13) that was originally approved for construction in 1988 to load jet "A" kerosene via a "no permit required" letter. In the response to Technical NOD #3 (Phase 1) received 02/28/05 the Bromley Pipeline Facility indicated that this point would cease operations immediately, and be dismantled and removed from the site.

The Bromley Pipeline Facility houses six (6) domed external floating roof tanks, EP 01 (9010), EP 02 (9020), EP 03 (9030), EP 06 (9060), EP 07 (9070), and EP 08 (9080); two (2) internal floating roof tanks, EP 09 (9110) and EP 10 (9120); and two (2) vertical fixed roof tanks, EP 04 (9040) and EP 05 (9050).

The Bromley Pipeline Facility previously operated under Title V permit V-97-012. During the renewal period for the Title V permit, the facility submitted a Conditional Major application to increase throughput to the limits specified below and add the VRU. Therefore, the permit is being issued under 401 KAR 52:030, Federally-enforceable permits for nonmajor sources.

EMISSION AND OPERATING CAPS DESCRIPTION:

The Bromley Pipeline Facility has requested voluntary limits to preclude the applicability of the RACT standards provided in 40 CFR 63, Subpart Y, *National Emission Standards for Marine Tank*

Vessel Loading Operations, by limiting gasoline loading to no greater than 411,600,000 gallons per year, which is equivalent to 9,800,000 barrels per year (i.e.: less than 10,000,000 barrels).

The Bromley Pipeline Facility has requested a voluntary limit of 85,000,000 gallons per year (2,023,809 barrels per year) on distillate loading through the Barge Loading Rack.

The Bromley Pipeline Facility has requested voluntary limits to preclude the applicability of the MACT emission standards provided in 40 CFR 63, Subpart Y, *National Emission Standards for Marine Tank Vessel Loading Operations*, by limiting maximum HAP emissions from the facility to less than 9 TPY of any individual HAP and less than 22.5 TPY of combined HAPs by utilizing the VRU to reduce HAP emissions from gasoline loading. The only requirements from the subpart are the emission estimation and recordkeeping requirements specified in 40 CFR 63.560(a)(3).

The Bromley Pipeline Facility has requested voluntary limits to preclude the applicability of 401 KAR 51:052, *Review of new sources in or impacting in non-attainment areas*, by utilizing the VRU to reduce VOC emissions when gasoline is loaded through the barge loading rack. The VRU will have a control efficiency of at least 95%. Through addition and use of the VRU there will actually be an emissions decrease in VOC's from the initial Title V to this permit.

Pursuant to 401 KAR 63:020, no owner or operator shall allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants. The modeling in Appendix A indicates that compliance with the source-wide VOC and HAP limits also demonstrates compliance with the air toxics rule.

Prior to the compliance demonstration of the vapor recovery unit, the total annual throughput of gasoline loaded through the Barge Loading Rack shall not exceed 42,380,000 gallons per year based on a twelve (12) month rolling total. This will insure that source-wide VOC emissions remain at or below 90 tpy.